



## UK Modern Slavery Act Statement for Financial Year 2019

At wolfcraft we respect human rights and the dignity of individuals. We do not tolerate any form of modern slavery or human trafficking. While no supply chain is without risk, wolfcraft is vigilant in its effort to ensure that supply chains remain free of any form of modern slavery or human trafficking. In accordance with section 54(1) of the UK Modern Slavery Act of 2015 in the currently valid version, we outline our ongoing efforts to continue to prevent any form of modern slavery or human trafficking within our operations or supply chains.

### Organisation

wolfcraft is a family owned business, founded in 1949 by Robert Wolff. With 70 years' experience in the DIY business, we are dedicated to enabling DIYers to carry out renovations and value-adding projects to the home, garden, rental properties, and recreational spaces cost effectively and with professional results. wolfcraft employs approximately 700 employees in total, both in manufacturing facilities located in Germany and Slovakia and in sales offices located in Germany, France, United Kingdom, Italy, Spain, Austria, and Poland. We supply international retail chains and online marketplaces. Spare parts for our tools are maintained on hand for up to 10 years. This assists our customers and promotes sustainability.

### Policy

wolfcraft has a clear company policy, not to work with suppliers suspected of or in risk of engaging in practices which are contrary to the MSA. We will not hesitate to sever relations with any supplier engaging in or utilising modern slavery or human trafficking. Our policy and our practice is to build long-term, ethical and sustainable relationships with our suppliers. In addition, we avoid sourcing in regions with the highest risk of slavery, human trafficking or unacceptable working conditions.

Potential suppliers are appraised by trained specialists in purchasing and quality management before any collaboration is agreed. In the course of collaboration, audits are conducted at regular intervals. Any risk or suspicion of modern slavery or human trafficking is reported directly to our board and to appropriate authorities. We aim to continuously improve our anti-slavery and human trafficking risk reporting procedures, in order to more quickly discover and more purposefully report any violations.

This will be achieved through clearer processes to enable workers and suppliers to raise concerns more easily through clearer grievance, whistleblowing, anti-corruption and anti-bribery policies. Throughout its history, wolfcraft has been a family and employee oriented company. wolfcraft has consistently valued and insisted upon ethical business relationships, integrity in relations with individuals and respect for human rights. This includes zero tolerance to slavery and human trafficking.

wolfcraft is a member of the Association of German Tool Manufacturers (Fachverband Werkzeugindustrie e.V.)(FWI) and a co-founder of the Home Improvement Manufacturers Association (HIMA), founded

in March 2000 as the European Federation of DIY Manufacturers (FEDIYMA), a consortium of DIY product manufacturers dedicated to safe, fair and socially and environmentally responsible practices in the DIY industry. wolcraft subscribes to the HIMA Code of Practice, introduced in 2014, in particular Principles 6 which obligates members to information sharing on supply chain risks, and in particular to collaboration in eradicating any instance of child labour in the supply chain as well as basic quality of life standards (<https://hima.network/code-of-practice/>).

## **Due Diligence**

wolcraft, as a European company, operates within the framework of European and German law forbidding any form of modern slavery or human trafficking in supply chains.

With our suppliers, we make our values known. Visits, inspections, audits, questionnaires and purchasing research have long been a part of the due-diligence efforts of our purchasing and quality-management departments. Our focus on long-term relationships is key, ensuring that our suppliers, their practices and business cultures are known and have satisfied our standards.

New suppliers are recruited with regard to their suitability for long-term, sustainable and ethical supply relationships. They are researched, investigated and visited by our experienced supply-chain and quality management professionals and selected according to their record of product quality and their quality of management, including ethical and human rights policies and practices. Country of origin is reported as required by law and by request from our customers.

## **Risk Management**

Though our manufacturing takes place predominantly within Europe, some of our suppliers are located in regions outside of Europe where increased risk is present. In these regions, traceability of supply chains become more difficult. These suppliers receive a higher level of scrutiny. Regions at highest risk as identified by recognised international indexes are avoided. Increasing information sharing with HIMA partners supports these efforts.

## **Effectiveness**

Our sustainable partnership approach is fundamental to inhibiting and preventing modern slavery or human trafficking practices. Before entering contracts, we conduct visits, audits, questionnaires and inspections of our suppliers. Even after suppliers are engaged, we monitor suppliers on a regular basis for both quality and ethical working conditions. We look to strengthen our processes where necessary as part of our continuous improvement policy.

## **Training**

Ethical risk awareness and best-practices have always been a part of our purchasing culture. Our capacity for recognition of suspicious practices and for development of even better formal procedures for the reporting risks of modern slavery and human trafficking within our supply chain continues to be tracked and adapted.

## Summary

The wolcraft board has formally recognised the importance of maintaining and developing improved measures to prevent, combat and eliminate any form of modern slavery or human trafficking from its supply chain.

The stringent following of current laws and norms as well as active participation and membership in SEDEX, REACH, ISO, and in FWI and HIMA, the Global DIY-Network and other recognized institutions is one essential aspect of this efforts. Our strategy of focusing on long-term, sustainable supplier and customer relationships supports our policy to combat modern slavery and human trafficking. The consequent evaluation and control of our suppliers is an additional and important part to ensure the standards within our supply chain.

Our cooperation with FWI and HIMA on information sharing and the setting of standards for an ethical, sustainable DIY industry serves to raise awareness of any new risk areas, best practices or improving standards for our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Slavery and Human Trafficking Statement for the financial year ending 31 December 2019.

This statement has been approved by the Board of Directors of wolcraft GmbH and signed by managing directors Thomas Wolff and Reinhard Wolff on 22 February 2021.



Thomas Wolff

Managing Director wolcraft GmbH



Reinhard Wolff

Managing Director wolcraft GmbH